

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORIYAN (01)
a.k.a. JAMES NORIYAN
DEHSHID NOURIAN (02)
a.k.a. DAVID NOURIAN
CHRISTOPHER RYDBERG (03)
MICHAEL TABA (07)

CRIMINAL NO. 3:17-cr-155-L

**THE UNITED STATES OF AMERICA’S OBJECTIONS TO DEFENDANT
JAMSHID NORIYAN’S WITNESSES AND EXHIBITS**

The United States of America files the following objections to Defendant Jamshid Noryian’s Witnesses and Exhibits. (*See* Dkts. 568, 570.)

I. OBJECTIONS TO WITNESSES

The government has no objections to Defendant Jamshid Noryian’s Witness List at this time but reserves the right to object based on testimony adduced at trial. (*See* Dkt. 568.)

II. OBJECTIONS TO EXHIBITS

Defendant Jamshid Noryian filed an Exhibit List adopting all government and co-defendant exhibit lists filed in this case. (*See* Dkt. 570.) In addition to the below, the government incorporates by reference its objections to the other Defendant exhibits in this case and reserves the right to object to any new exhibits offered by Defendant Jamshid Noryian at trial.

Defense Exhibit No.	Bases for Objections
36 (Tax Document)	FRE 402, 403, 802, 901
60–110 (Real Estate Documents, Email Communications, and Loan Documents)	FRE 402, 403, 602, 802, 901
112–125 (Loan and Remodeling Documents)	FRE 602, 802, 901
126 (Taba Repayments)	FRE 402, 403, 802
200–215 (Property Documents)	FRE 402, 403
220–252 (Loan and Other Financial Documents)	FRE 402, 403, 802, 901
260–267 (Bankruptcy Documents)	FRE 402, 403, 802
268–284 (Loan and Business Documents)	FRE 402, 403, 802, 901

III. CONCLUSION

For the foregoing reasons, the government objects to the above-referenced witnesses and exhibits for Defendant Jamshid Noryian.

Respectfully submitted,

LEIGHA SIMONTON
UNITED STATES ATTORNEY

GLENN S. LEON
CHIEF, FRAUD SECTION

/s/ Ethan Womble

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